

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

ERIC FORSYTHE, et al.,

Plaintiff,

v.

SUN LIFE FINANCIAL, INC., ET AL.,

Defendants

No. 04-10584-GAO

MARCUS DUMOND, HENRY BERDAT,  
STUART V. and ROSEMARY STURGESS,  
KATHLEEN BLAIR, WILLIAM and MARGIE  
BOOTH, KAREN PEACH, and RICHARD and  
EVELYN KELLER,

Plaintiffs,

v.

MASSACHUSETTS FINANCIAL SERVICES  
COMPANY and MFS FUND DISTRIBUTORS,  
INC.,

Defendants.

No. 04-11458-GAO

**STIPULATION TO JOINT PROPOSED SCHEDULE**

The parties have conferred and hereby jointly propose the following schedule for  
the above-captioned cases:

Plaintiffs' Amended Consolidated Complaint      To Be Filed by March 3, 2005  
(in Forsythe):

Defendants' Motions to Dismiss (both cases):      To Be Filed By April 8, 2005

Plaintiffs' Oppositions (both cases):      To Be Filed By May 11, 2005

Defendants' Reply Briefs (both cases):      To Be Filed By June 10, 2005

The parties respectfully request that the Court approve this stipulation.

Respectfully Submitted,

The Forsythe plaintiffs,

By their attorneys,

/s/ Jonathan A. Shapiro

Nancy Freeman Gans (BBO #184540)  
Moulton & Gans, P.C.  
33 Broad Street, Suite 1100  
Boston, MA 02109-4216  
(617) 369-7979

The Dumond plaintiffs,

By their attorneys,

/s/ Jonathan A. Shapiro

Edward F. Haber (BBO #215620)  
Michelle H. Blauner (BBO #549049)  
SHAPIRO HABER & URMY LLP  
53 State Street  
Boston, MA 02109  
(617) 439-3939

Respectfully Submitted,

Sun Life Financial, Inc., Massachusetts  
Financial Services Co., and MFS Fund  
Distributors, Inc.,

By their attorneys,

/s/ Jonathan A. Shapiro

Jeffrey B. Rudman (BBO #433380)  
William H. Paine (BBO #550506)  
Jonathan A. Shapiro (BBO #567838)  
WILMER CUTLER PICKERING  
HALE AND DORR LLP  
60 State Street  
Boston, MA 02109  
(617) 526-6000

Jeffrey L. Shames,

By his attorneys,

/s/ Jonathan A. Shapiro

James C. Rehnquist (BBO #552602)  
Abigail K. Hemani (BBO #650721)  
GOODWIN PROCTER LLP  
Exchange Place  
53 State Street  
Boston, MA 02109

John W. Ballen,

By his attorneys,

/s/ Jonathan A. Shapiro

John F. Falvey, Jr. (BBO # 542674)

GOODWIN PROCTER LLP

Exchange Place

53 State Street

Boston, MA 02109

Kevin J. Parke,

By his attorneys,

/s/ Jonathan A. Shapiro

George J. Skelly (BBO #546797)

David M. Ryan (BBO #644037)

NIXON PEABODY LLP

101 Federal Street

Boston, MA 02110

Lawrence H. Cohn, William R. Gutow,

J. Atwood Ives, Abby M. O'Neill,

Lawrence T. Perera, William J. Poorvu,

J. Dale Sherratt, Elaine R. Smith,

Ward Smith, and the MFS Funds,

By their attorneys,

/s/ Jonathan A. Shapiro

John D. Donovan (BBO #130950)

Jane E. Willis (BBO #568024)

ROPES & GRAY LLP

One International Place

Boston, MA 02110

March 7, 2005

SO ORDERED:

Dated: \_\_\_\_\_

\_\_\_\_\_  
George A. O'Toole  
United States District Judge